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July 7, 2023

By ECF

The Honorable Cathy L. Waldor, U.S.M.J.
United States District Court, District of New Jersey
50 Walnut Street
Newark, NJ 07101

Re: *Johnson & Johnson Health Care Systems Inc. v. Save On SP, LLC*
Civil Action No. 22-2632 (ES-CLW)

Dear Judge Waldor:

Together with Patterson Belknap Webb & Tyler LLP, we represent Plaintiff Johnson & Johnson Health Care Systems Inc. ("JJHCS") in the above-referenced action. As the Court is aware, the parties submitted a joint letter under seal on June 23, 2023 (ECF No. 122), regarding a discovery dispute over "non-JJHCS custodians" and subsequently appeared before Your Honor on June 27, 2023, for oral argument on this subject.

To avoid potentially filing multiple motions to seal covering the same subject matter, JJHCS herein seeks leave to file a single motion to seal that would cover the June 23, 2023 letter (ECF No. 122) and, if necessary, the transcript from the June 27, 2023 hearing. Because the transcript is not yet available and JJHCS requires time to review the transcript and determine whether any parts would need to be sealed, JJHCS also seeks an extension of time to file such a motion until a date no later than 14 days after JJHCS receives the transcript of the June 27 hearing. Counsel for Plaintiff Save On SP, LLC consents to this request.

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We respectfully request that Your Honor “so order” this letter to indicate the Court’s consent to the above proposal. We appreciate the Court’s attention to this matter.

Respectfully yours,

/s/ Jeffrey J. Greenbaum

JEFFREY J. GREENBAUM

cc: All counsel of record (by ECF)